

# EXHIBIT 2

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**From:** Jaime Dole <Jaime.Dole@arlaw.com>  
**Sent:** Friday, November 16, 2018 4:27 PM  
**To:** Vaughan, Aria (CRT); Louis Fisher; John Hooks  
**Cc:** John Compton; Natasha Merle; Kristen A. Johnson; John Cusick; Singleton, Natane (CRT)  
**Subject:** Barnhardt, et al. v. Meridian Public School District - District's Responses to Government's Discovery  
**Attachments:** District's Verified Discovery Responses to Government.pdf

Counsel,

Please see attached the District's verified responses to the United State's first set of discovery. Responsive documents can be downloaded using the link below:

<https://arlaw.sharefile.com/d-sffd8a83c9fb43e8a>

Regards,

Jaime

**Jaime Dole**

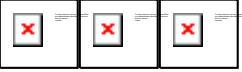
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THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION

JOHN BARNHARDT, ET AL.

PLAINTIFFS

and

UNITED STATES OF AMERICA

PLAINTIFF INTERVENOR

v.

CIVIL ACTION NO. 4:65-cv-01300-HTW-LRA

MERIDIAN MUNICIPAL SEPARATE  
SCHOOL DISTRICT, ET AL.

DEFENDANTS

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**Meridian Public School District's Responses to United States' First Set of  
Interrogatories, Requests for Production of Documents, and Requests for Admissions**

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Defendant Meridian Public School District responds to the United States' first set of interrogatories, requests for production of documents, and requests for admissions under Federal Rules of Civil Procedure as follows:

**INTERROGATORIES**

**Interrogatory No. 1:** Provide a description of steps the District has taken to comply with paragraphs 87, 90, 93, and 97 of the 2013 Consent Order.

**Answer:** Steps the District has taken to comply with paragraphs 87, 90, 93, and 97 of the Consent Order include:

- The District provided the Department of Justice with a response to the letter dated June 10, 2015.
- August 8, 2016 - DOJ submitted feedback to the district
- March 30, 2017 - DOJ provided the district with further feedback
- April 26, 2017 - Hard copies of the District's SROs and SSO policies and procedures were provided to DOJ

- June 10, 2015 - the police department and complaint process procedures and form were uploaded to NetDocuments
- See also materials previously provided via NetDocuments under Law Enforcement.

**Interrogatory No. 2:** Provide a description of how any current or proposed policies regarding school resource officers differ from the version submitted to the United States on April 26, 2017 during our site visit.

**Answer:** See Response to Request for Production No. 3, below.

### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

**Request No. 1:** All documents and communications regarding the Meridian Public School District Police Department's policies and procedures on Use of Force, including but not limited to the definition of force discussed by Chief Clayton at his deposition taken pursuant to FRCP 30(b)(6). See MPSD 30(b)(6) Clayton Dep.

**Response:** See documents produced as MPSD-001025-1034.

**Request No. 2:** All documents and communications regarding any request for the United States' feedback on policies and procedures as discussed by Chief Clayton at his deposition taken pursuant to FRCP 30(b)(6). See MPSD 30(b)(6) Clayton Dep.

**Response:** Please reference the District's response in NetDocuments to the DOJ's letter dated June 10, 2015. In addition to conference calls, a site visit was conducted on Tuesday, May 17, 2017, by Aria Vaughn and the Department of Justice's Policing expert.

**Request No. 3:** All current or proposed district policies regarding school resource officers and school security officers. See MPSD 30(b)(6) Clayton Dep.

**Response:** With the exception of the revisions to policies 3.03, 4.08, and 5.01 suggested by the United States, there have been no changes or proposed changes to the "Campus Police Department

Law Enforcement Policies & Procedures" provided April 26, 2017. The United States is already in possession of the "Campus Police Department Law Enforcement Policies & Procedures." With respect to the proposed revisions to policies 3.03, 4.08, and 5.01, see documents produced as MPSD-001035 through MPSD-001069, which represent the United States' suggested revisions and the District's revised versions of these policies.

**Request No. 4:** All professional development or training materials the District provides to school resource officers and school security officers regarding Meridian Public School District Police Department's policies and procedures.

**Response:** See documents produced as MPSD-000802 through MPSD-001024. These documents have been previously provided as part of the District's bi-annual reports. The bi-annual reports may contain further information on professional development and other training of SROs.

#### **REQUESTS FOR ADMISSIONS**

**Request for Admission No. 1:** Admit the authenticity of all documents produced by MPSD in response to the United States' Interrogatories and Requests for Production of Documents above.

**Response:** Objection. This is an improper use of a request for admission. The District is not aware of any inaccurate information contained in documents created by its employees as of the date of production. This District does not stipulate to the admissibility of any documents without proper foundation and other evidentiary requirements being met.

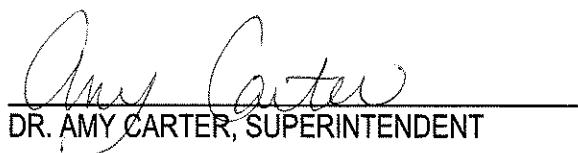
**Request for Admission No. 2:** Admit that all documents produced by MPSD in response to the United States' Interrogatories and Requests for Production of Documents above are accurate as of the date of production.

**Response:** Objection. This is an improper use of a request for admission. The District is not aware of any inaccurate information contained in documents created by its employees as of the date of

production. This District does not stipulate to the admissibility of any documents without proper foundation and other evidentiary requirements being met.

Respectfully submitted, this 16th day of November 2018.

**Meridian Public School District**



Amy Carter  
DR. AMY CARTER, SUPERINTENDENT

AS TO OBJECTIONS:

/s/ John S. Hooks  
\_\_\_\_\_  
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MS Bar No. 1126  
John S. Hooks  
MS Bar No. 99175  
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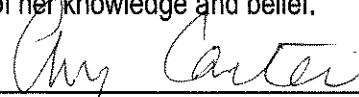
And

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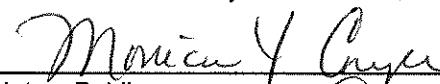
## VERIFICATION

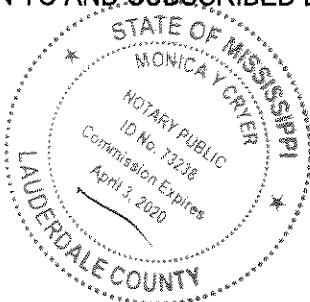
STATE OF MISSISSIPPI  
COUNTY OF LAUDERDALE

Personally appeared before me, the undersigned authority in and for the jurisdiction aforesaid, Dr. Amy Carter, Superintendent of Meridian Public School District, who, being duly sworn, states on oath that she has signed the above and foregoing Answers to the United States' First Set of Interrogatories, Requests for Production of Documents, and Requests for Admissions, and that the matters and things contained therein are true and correct to the best of her knowledge and belief.

  
\_\_\_\_\_  
Dr. Amy Carter, Superintendent

SWORN TO AND SUBSCRIBED BEFORE ME, this 16 day of November, 2018.

  
\_\_\_\_\_  
Monica Y. Cripe  
Notary Public  
My Commission Expires: April 3, 2020



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed a notice of service of the above document with the Clerk of Court using the CM/ECF system and caused a true and correct copy of the above document to be served on counsel for the United States via electronic mail as listed below:

Aria Vaughn ([Aria.Vaughn@usdoj.gov](mailto:Aria.Vaughn@usdoj.gov))  
Natane Singleton ([Natane.Singleton@usdoj.gov](mailto:Natane.Singleton@usdoj.gov))  
United States Department of Justice  
Civil Rights Division, Educational Opportunities Section  
950 Pennsylvania Ave., N.W., PHB 4300  
Washington, DC 20530

Electronic service has also been provided to counsel for the Private Plaintiffs.

Dated: November 16, 2018.

/s/ John S. Hooks